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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Case No. 2:13-cv-02005-LDG-CWH

Matthew Alexander,

Plaintiff,

vs.

GNL, Corp. and
GNLV, Corp.,

Defendants.

**DEFENDANTS' MOTION TO FILE
UNDER SEAL DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

Comes now Defendants GNL, Corp. and GNLV, Corp. (collectively "Defendants"), by and through their attorneys, Greenberg Traurig, LLP, and hereby file this motion to file under seal Defendants' Motion for Summary Judgment ("Motion").

On November 14, 2014, the Court granted Defendants' Motion for Protective Order [Doc. No. 84], adopting Defendants' proposed protective order and confidentiality agreement.

Pursuant to the terms of the protective order, information disclosed at the deposition of a party of one of its present or former officers, directors, or independent experts may be designated by any party as "Confidential". The parties have agreed that the entirety of the deposition testimony of Defendants' 30(b)(6) witness, Lori Kittle, would be deemed confidential due to the disclosure of sensitive business information.

1 Defendants are filing a Motion for Summary which memorandum of points and authorities
2 contains information designated as Confidential during the deposition of Ms. Kittle. Additionally,
3 Exhibit A to the Motion contains excerpts from the deposition transcript of Ms. Kittle, the entirety
4 of which has been deemed confidential under the protective order. Public disclosure of information
5 contained in the Motion along with the deposition excerpts attached as an exhibit to the Motion
6 would waive the confidential nature of the testimony.

7 WHEREFORE, Defendants respectfully request that the Court grant them leave to file the
8 Motion for Summary Judgment, along with all supporting exhibits under seal.

9 Dated: November 24, 2014.

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11 GREENBERG TRAUIG, LLP

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13 BY: 

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21 **ORDER**

22 Having read and considered Defendants' Motion to File Under Seal Defendants' Motion for
23 Summary Judgment, and for good cause shown,

24 It is so ORDERED this 25 day of November, 2014 that Defendants' Motion for
25 Summary Judgment, be filed under seal.

26 
27 UNITED STATES DISTRICT JUDGE
28 LLOYD D. GEORGE